

MEMO ENDORSED.

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Application GRANTED. The Case Management Conference currently scheduled for November 19 is ADJOURNED to December 17, 2024, at 11:00 a.m. The parties' Rule 26(f) Report is due December 10, 2024.

November 12, 2024

SO ORDERED.



Ona T. Wang
U.S.M.J.

Nov. 13, 2024

VIA ECF

Hon. Ona T. Wang
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 20D
New York, NY 10007

Re: *Borjas v. N.Y.C. Dep't of Education* (Case No. 23-CV-10829) – Plaintiff's Letter Motion to Adjourn the Case Management Conference and to Extend the Deadline for the Parties' Rule 26(f) Report

Dear Judge Wang:

Plaintiff Stacy A. Borjas, through her undersigned *pro bono* counsel, respectfully requests that the Court adjourn the Case Management Conference (“CMC”) for 21 days from November 19, 2024, to December 10, 2024, or the next available date thereafter. Plaintiff additionally requests that the Court extend the corresponding deadline for the parties to file their Report of Rule 26(f) Meeting and Proposed Case Management Plan (“Rule 26(f) Report”) from today, November 12, 2024, to one week before the new CMC date (*i.e.*, December 3, 2024, if the new CMC date is set for December 10, 2024).¹

The parties held a meet and confer pursuant to Rule 26(f) on October 29, 2024, and have been negotiating a number of topics, including the content of their Rule 26(f) Report. However, just today, counsel for the parties came to the understanding that more time is necessary to conduct these negotiations and for such negotiations to be productive. Although Plaintiff accordingly believes Defendants generally concur with Plaintiff's request for an adjournment, counsel for

¹ This is Plaintiff's first request for an adjournment of the CMC. (Plaintiff previously requested three extensions of various other deadlines in the case, all of which the Court granted.)

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Plaintiff were not able to confirm Defendants' consent to the exact 21-day adjournment hereby requested by Plaintiff by the time of the filing of this letter motion after business hours. Counsel for Plaintiff will endeavor to confer with counsel for Defendants concerning the requested duration of the adjournment and will report Defendants' position thereon to the Court as soon as possible.

Respectfully submitted,

/s/ Nicolas G. Keller
Nicolas G. Keller

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